

ADMINISTRATIVE COMPLETENESS REVIEW WORKSHEET (R645-301-150)

DATE: January 26, 1999

REVIEWER(S): Wayne Western, Engineering: Bob Davidson, Soils: Paul Baker, Administrative/
Wildlife/Vegetation, Jim Smith, Geology: David Darby, Hydrology

APPLICANT: UtahAmerican Energy Corporation

MINE NAME: Horse Canyon/Lila Canyon

FILE NO. ACT/007/013 #2

"Administratively Complete Application" means an application for permit approval or approval for coal exploration, where required, which the Division determines to contain information addressing each application requirement of the State Program and to contain all information necessary to initiate processing and public review.

Directions: The categories listed below correspond to the minimum requirements for information necessary to initiate processing and public review. If a category is checked the Applicant has met the Completeness requirement for that category. If a category is not checked, the Completeness requirements have not been met. The comments column will identify the deficiency and what is necessary to correct it.

		Comments
301-112	Identification of Interests <u>X</u>	
100	Applicant's Business Structure <u>X</u>	
210	Applicant's Name/Address/Phone <u>X</u>	
220	Resident Agent's Name/Address/Phone <u>X</u>	

230	Name/Address/Phone of AML Fees Payer <u> X </u>	
300	Corporate Structure & Ownership <u> X </u>	
400	Identify Other Mining Operations in US <u> X </u>	
500	Surface & Mineral Ownership <u> X </u>	
600	Ownership Contiguous to Permit <u> X </u>	
700	MSHA Numbers <u> X </u>	The MSHA number shown in the application is for the Horse Canyon Mine. This section can be considered administratively complete, but the applicant will need to include the new numbers when they become available.
800	Interest in Contiguous Lands <u> X </u>	Application contains conflicting information but consider administratively complete.

Comments

188	Violation Information <u> X </u>	
100	Suspension or Revocation Information <u> X </u>	

300	List of Violations - 3 Previous Years	<u>X</u>	
301-200	Soils	_____	<p>None of the maps show a disturbed area boundary and therefore, the Division is unable to ascertain if soil resource information is complete.</p> <p>Information in the plan is vague at best , confusing, contradictory and inconclusive. Therefore, the Division is unable to ascertain if soil resource protection measures are adequate of meet regulatory compliance.</p>
211	Description of Premining Soil Resources	_____	Need disturbed area boundary shown on all maps to ascertain if soil resource information is complete.
212	Soil Resource Protection Measures	_____	<p>Need pre-disturbance contour lines on soil salvage map.</p> <p>Need a soil salvage map.</p> <p>Need disturbed area boundary shown on soil salvage map to help determine if soil is being salvaged from disturbance affected areas.</p> <p>Information in the plan is vague at best, confusing, contradictory and inconclusive. Therefore, the Division is unable to ascertain if soil resources protection measures are adequate of meet regulatory compliance.</p>
221	Prime Farmland Investigation	<u>X</u>	
222-223	Soil Survey and Soil Characterization	<u>X</u>	

224	Substitute Topsoil Info (When Proposed) _____	Adequate soil survey for reclaiming the entire mine site needs to be ascertained before a determination can be made that substitute topsoil is not needed. One specific area of concern is the rock outcrop/Badland slopes. If these areas contain no soil and cannot be revegetated, then reclamation can not be achieved. Appropriate quantities of topsoil and substitute soils and rock need to be salvaged and stockpiled for reclamation of these difficult areas.
230	Operation Plan: Topsoil Handling/Removal/Storage _____	The exact location, size dimension, etc of the topsoil stockpile is needed based on projected soil salvage volumes. Final configuration should be sized and shaped to show that enough room is available for projected soil salvage.
240	Reclamation Plan: Soil Redistribution/Stabilization _____	Need a soil redistribution and placement map. Projected soil replacement depths should be outlined for each reclaimed area. One specific area of concern is the rock outcrop/Badland slopes. If these areas contain no soil and cannot be revegetated, then reclamation can not be achieved. Reclamation of these difficult areas will need to be addressed in depth to assure that reclamation can be achieved.

301-114	Right of Entry _____ <u>X</u> _____	Consider administratively complete; however, full right of entry has not yet been given by the BLM. The application contains a copy of a letter from the BLM indicating they have received five right of way applications for various facilities associated with the mine, but there is no indication the rights of way have been granted. The area involved includes most of the surface facilities area.
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301-115	Status of Unsuitability Claims	<u>X</u>	The application contains a letter from Jay Marshall to the Emery County road supervisor requesting approval to mine within 100 feet of the county road. The application will need to contain approval from Emery County for mining within 100 feet of a public road.
301-116	Permit Term	<u>X</u>	
301-117Insurance	<u>X</u>	Insurance policy included, but it does not meet regulatory requirements.
Proof of Publication	<u>X</u>	Proof of publication would need to be submitted after advertising is complete.
Facilities and Structures Used in Common	<u>X</u>	
301-118	Filing Fee	<u>X</u>	Filing fee not required for revisions.
Comments			
301-123	Notarized Signature of Responsible Official	<u>X</u>	
301-130	Information Collection: Technical Data Accompanied by Names of Persons or Organizations that Collected and Analyzed the Data - Dates of Collections - and Analysis of the Data and Description of the Methodology Used to Collect and Analyze Data	<u>X</u>	This regulation needs to be reviewed for each section of the application. Consider complete.

Comments

301-300	Biology	<u> X </u>	
320	Vegetation Information	<u> X </u>	It appears the information is administratively complete but not technically adequate; however, without maps showing the precise are of disturbance, it is impossible to say if all proposed disturbed areas were included in sampling.
322	Fish and Wildlife Information	<u> X </u>	The application contains a survey for rare plant and animal species, but it will need further information about a listed and a proposed endangered species. Raptor nesting locations need to be clarified.
323	Maps/Photos: Vegetation-Fish-Wildlife Areas	<u> X </u>	
330	Operation Plan: Vegetation-Fish-Wildlife Protection	<u> X </u>	
341	Reclamation Plan for Revegetation	<u> X </u>	
342	Fish & Wildlife Plan for Reclamation Phase	<u> X </u>	

301-400	Land Use and Air Quality	<u> </u>	Not complete; see comments below.
411	Pre-Mining Land Use Information (Includes Cultural Resources)	<u> </u>	Information is not complete. The application mentions the wilderness study area with which the proposed permit area overlaps, but it does not discuss the BLM's land use plans for the wilderness study area. Cultural resources information will need to be considered confidential.

412	Post-Mining Land Use Information	_____	Application does not contain comments concerning the postmining land use from the land owner. The applicant is proposing to leave the sediment pond.
420	Air Quality	<u> X </u>	The application says the applicant has applied for approval from the Division of Air Quality; however, a representative of Air Quality said they have not yet received a notice of intention.

Comments

301-500	Engineering	_____	
510 and 520	General Description of Operation Plan: (Maps, Locations, Cross-Sections, Narrative, Descriptions & Calculations)	_____	<p>The Permittee did not provide the Division with an adequate description of the operation plan. For example the Permittee states that Plate 5-2 shows the location of many objects in the permit area. However, Plate 5-2 only shows the disturbed area boundary for the Lila Canyon mine. Another example is in section 521.125 of the Lila Canyon revision the Operator states that the location of the sediment ponds is shown on Plate 5-2. R645-301-521.125 refers to existing structures (structures that existed prior to the permit being issued). Since no sediment ponds exists at the site then no sediment ponds should be shown on the existing facilities map.</p> <p>The Division will not list all the deficiencies in the operation plan in the ACR. The Permittee has the responsibility to give the Division a complete and accurate plan.</p>
522	Coal Recovery Description	_____	The Division needs detailed information on how coal recovery will be maximized. This information is similar to that required by the BLM for the R2P2.
523	Mining Methods	<u> X </u>	
524	Blasting and Explosives Plan	<u> X </u>	

525	Subsidence Control Plan _____	The Operator claims that a subsidence control plan is not needed because there are no renewable resource lands in the permit area. However, the Operator already committed to conduct a subsidence survey in the existing plan. Therefore, a subsidence control plan is needed for the Lila Canyon revision.
526	Mine Facilities Description (Narrative, Plans, Maps) Including Existing Structures & Support Facilities _____	The Operator did not describe the new facilities at the Lila Canyon mine. See R645-301-526.100.
527	Transportation Facilities (Including Plans & Maps) _____ <u>X</u>	
528	Coal Mine Waste Plans (Description & Designs) _____ <u>X</u>	
529	Management of Mine Openings (Design) _____ <u>X</u>	
531	General Plans for Structures _____ <u>X</u>	
532	Sediment Control _____ <u>X</u>	The Operator met the engineering requirements for sediment control.
533	Impoundments _____	Appendix 7-4 does not address the engineering requirements for impoundments.

301-534	Roads (Plans, Drawings, Designs, & Specifications) _____	The Division does not have enough information to determine if the access roads to the site need to be permitted.
535	Spoil _____ <u>X</u>	
536	Coal Mine Waste _____	Amendment does not have plans. The operator restates the regulatory requirement.

537	Regraded Slopes	_____	The Permittee did not give enough information about the regraded slopes, or why they would be left in place. Since the site is undisturbed, the Permittee should be able to achieve the approximate original contour requirements.
540 541-542	Reclamation Narrative, Maps and Plans	<u> X </u>	The Permittee did not provide the Division with reclamation cross sections or an adequate narrative of the reclamation plan.
551	Casing and Sealing: Underground Openings	<u> X </u>	
553	Backfilling and Grading Description	_____	The Permittee did not provide the Division with reclamation cross sections. The Permittee did not provide the Division with an adequate narrative of the backfilling and grading plan.

301-600	Geology	<u> X </u>	
621	Description of Geology (Permit & Adjacent Area)	<u> X </u>	
622	Geologic Cross-Sections, Maps, and Plans	<u> X </u>	
630	Plans for Casing and Sealing Holes	<u> X </u>	No plans were found in Chapter 6 - Geology, but apparently there will be no holes drilled.

Comments

301-700	Hydrology	<u> X </u>	
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721	Description of Hydrologic Resources: (Permit and Adjacent Area) <u> X </u>	
722	Cross-Sections and Maps: Subsurface Water - Surface Water - Monitoring Stations - Wells <u> X </u>	
723	Sampling and Analysis <u> X </u>	
724	Baseline Information: Ground Water - Surface Water - Geology - Climatological & Supplemental; If Needed <u> X </u>	
728	PHC Determination <u> X </u>	
730	General Operation Plan: Minimize Disturbance to Hydrologic Balance & Compliance with Clean Water Act <u> X </u>	
731	Ground and Surface Water Protection <u> X </u>	
732	Ground and Surface Water Monitoring <u> X </u>	

Comments

301-740	Plans and Designs: Operation and Reclamation Plan Sediment Control Measures <u> X </u> Siltation Structures <u> X </u> Sediment Ponds <u> X </u> Other Treatment Facilities <u> X </u> Diversions <u> X </u> Road Drainage <u> X </u> Impoundments <u> X </u> Discharge Structures <u> X </u> Disposal of Excess Spoil <u> X </u> Coal Mine Waste <u> X </u> Disposal of Non-Coal Mine Waste <u> X </u> Casing and Sealing of Wells <u> X </u>	
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301-800	Bonding and Insurance <u> X </u>	
820	Applicant: Have Adequate Bond at Permit Issuance <u> X </u>	

830	Bond Estimate and Calculations Provided _____	The Division is unable to determine the bond amount because the Permittee did not give the Division detailed earthwork calculations. The Division recommends that the Permittee use the procedures outlined in the OSM Handbook on Reclamation Cost Estimates for earthwork calculations.
890	Certificate of Insurance Provided <u> X </u>	
302 through 321	Alluvial Valley Floor Determination _____	This findings needs to be made by the NRCS or BLM.